| 1 | JOHN L. BURRIS, ESQ., SBN 69888 | | |
|-----|---|---|--|
| | BEN NISENBAUM, ESQ., SBN 222173 | | |
| 2 | JAMES COOK, ESQ., SBN 300212 | | |
| 3 | LAW OFFICES OF JOHN L. BURRIS | | |
| | Airport Corporate Center | | |
| 4 | 7677 Oakport Street, Suite 1120 Oakland, CA 94621 | | |
| ا ہ | Telephone: (510) 839-5200 Facsimile: (510) 839-3882 Email: John.Burris@johnburrislaw.com Email: Ben.Nisenbaum@johnburrislaw.com | | |
| 5 | | | |
| 6 | | | |
| | | | |
| 7 | Email: James.Cook@johnburrislaw.com | | |
| | | | |
| 8 | ZAKIYAH GUILLORY, CHERIE BRANCH GUILLORY, T.G. and M.W. by and through their Guardian ad Litem, CHERIE BRANCH GUILLORY | | |
| 9 | | | |
| | | | |
| 10 | CHERIE BRANCH GUILLORT | | |
| 11 | | | |
| 11 | SUSANA ALCALA WOOD, City Attorney (SBN 156366) ANDREA M. VELASQUEZ, Senior Deputy City Attorney (SBN 249210) | | |
| 12 | | | |
| | CITY OF SACRAMENTO | | |
| 13 | 915 I Street, Room 4010 | | |
| 14 | | | |
| 1. | Telephone: (916) 808-5346 | | |
| 15 | Facsimile: (916) 808-7455 AVelasquez@cityofsacramento.org | | |
| 16 | | | |
| 16 | | | |
| 17 | Attorneys for the CITY OF SACRAMENTO, IRA PRAHL, DARBY LANNOM, LIAM | | |
| | KELLY, ALLISON SMITH, RAVEN POWERS | , | |
| 18 | | | |
| 19 | | | |
| 1) | UNITED STATES I | DISTRICT COURT | |
| 20 | | | |
| | FOR THE EASTERN DISTRICT OF CALIFORNIA | | |
| 21 | | | |
| 22 | | | |
| | ZAKIYAH GUILLORY, et al., | CASE NO.: 2:21-cv-00807-MCE-AC | |
| 23 | Plaintiffs, | | |
| 24 | riamuns, | STIPULATION FOR LEAVE FOR | |
| 24 | VS. | PLAINTIFFS TO FILE AMENDED | |
| 25 | | COMPLAINT; ORDER THEREON | |
| | CITY OF SACRAMENTO; et al., | Judge: Senior Judge Morrison C. England, Jr | |
| 26 | D.C. I. | Date Action Filed: May 5, 2021 | |
| 27 | Defendants. | Trial Date: Not Set | |
| - ' | | | |
| 28 | | | |

Case 2:21-cv-00807-MCE-AC Document 16 Filed 10/01/21 Page 2 of 2

| 1 | The parties, by and through their respective counsel, respectfully submit this Stipulation and | |
|----|--|--|
| 2 | Proposed Order for leave for Plaintiffs to file a First Amended Complaint. The parties met and | |
| 3 | conferred to discuss the contents of Plaintiffs Complaint. During the initial meet and confer | |
| 5 | discussion, the parties agreed for Plaintiffs to make substantive changes to the Complaint. Based on | |
| 6 | the foregoing, the parties stipulate, and jointly request leave for Plaintiffs to file a First Amended | |
| 7 | Complaint by September 30, 2021. The parties further stipulate and request an extension of time for | |
| 8 | Defendants to file a response to the FAC no later than 21 days after the date the FAC is filed. | |
| 9 | IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD. | |
| 10 | | |
| 11 | Dated: September 30, 2021 THE LAW OFFICES OF JOHN L. BURRIS | |
| 12 | /s/James Cook James Cook | |
| 13 | Attorney for Plaintiff | |
| 14 | Dated: September 30, 2021 CITY OF SACRAMENTO ATTORNEYS' OFFIC | |
| 15 | /s/Andrea M. Velasquez | |
| 16 | Susana Alcala Wood | |
| 17 | Andrea M. Velasquez Attorneys for Defendants | |
| 18 | CITY OF SACREMENT | |
| 19 | | |
| 20 | <u>ORDER</u> | |
| 21 | Pursuant to the foregoing stipulation of the parties, and good cause appearing, it is hereby | |
| 22 | ordered that Plaintiffs may file a First Amended Complaint up to and including September 30, 2021 | |
| 23 | Defendants shall file a response to the FAC no later than 21 days after the date the FAC is filed. | |
| 24 | IT IS SO ORDERED. | |
| 25 | Dated: September 30, 2021 | |
| 26 | Marin // L. | |
| 27 | MORRISON C. ENGLAND, JR SENIOR UNITED STATES DISTRICT JUDGE | |

28